

June 1, 2009

The Honorable Michael J. Copps
FCC Acting Chairman and Commission Members
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: A National Broadband Plan for Our Future, GN Docket No. 09-51

Dear Acting Chairman Copps and Commissioners:

The mission of the World Institute on Disability (WID) is to eliminate barriers to full social integration and increase employment, economic security and health care for persons with disabilities. WID creates innovative programs and tools; conducts research, public education, training, and advocacy campaigns; and provides technical assistance. An internationally recognized public policy center founded in 1983 by leaders of the Independent Living Movement, WID' program work focuses on issues and problems that directly affect people's ability to live full and independent lives. A majority of the Board and staff are persons with disabilities.

We have all seen firsthand how broadband enhances the quality of life for people with disabilities in America. However, there are currently obstacles that inhibit individuals with disabilities from adopting broadband. For this reason, we believe that the FCC's development of a national broadband plan marks an opportunity to alleviate some of the inequities that have prevented these Americans from accessing technologies that can enhance their ability to live independent lives.

Recent statistics from the Bureau of Labor show that the unemployment rate for individuals with disabilities is nearly double that of adults with no disability. Many people with disabilities face serious barriers to employment, including transportation, lack of specific training or education, or adequate personal care that can be removed through technology. But in-home broadband technology allows people with disabilities throughout the world to telecommute and or run businesses from their own homes. On-line education can help people with and without disabilities to develop the skills needed to meet the demands of the modern

workplace.

Services that promote employment such as the World Institute on Disability's own Proyecto Vision and DB101 provide information that assist people with disabilities obtain and maintain employment – but only those who have access to the Internet can use these tools.

The affordability of broadband service and the even higher cost of assistive technology are serious barriers to adoption. We urge the FCC to remove these barriers and to increase the adoption rate of people with disabilities through targeted outreach. This outreach should be made not only to those who are fluent in English but ASL, Spanish and other languages widely used in the United States.

Telehealth and telemedicine are important to people with disabilities. Telemedicine applications make it possible for people to see a physician from the convenience of their homes and access to telemedicine may be the only way some people can truly live in their communities of choice. Real-time videos on the Internet allow doctors to make visual assessments of patients and programs have been established to provide psychiatric assistance to people living in areas without therapists. It can also support those who are fluent in American Sign Language. It is therefore critical that the FCC's plans address the needs to make these services accessible to people with a range of disabilities by educating and encouraging developers to use Universal Design and to follow accessibility standards such as the W3C Web Content and Accessibility Guidelines 2.0 and those developed for Section 508.

As the FCC develops a national broadband strategy, we urge you to consider the impact that broadband technology can have on improving the lives of Americans with disabilities. As the FCC has previously identified the disabled community as a group that is particularly lacking in broadband adoption, the Commission must specifically consider initiatives that would improve adoption rates.

Additionally, the FCC must allow network providers to have the authority to manage their own networks. Smart networks ensure the expedient delivery of time-sensitive materials like medical information and emergency response transmissions. This is especially important during times of crisis, like Hurricane Katrina, when better communication should have been facilitated between first responders and people with disabilities living

independently. As many individuals with disabilities use voice and video applications to connect with others, smart networks are also needed to reduce transmission delays for effective communication. In order to guarantee the best user experience and that the benefits of high-speed technologies are effectively utilized, smart networks are critical.

If the U.S. can take the lead on this issue now, we can serve as an example for the international community on how broadband can improve the independence and economic development of people with disabilities.

WID encourages the FCC to include provisions in the national broadband plan that will make broadband more readily available and accessible to people with disabilities. Our community has much to gain from broadband connections and the opportunities that they enable.

Sincerely,

Kathy Martinez
Executive Director